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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.  
COTTON**

This Document Relates to:

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

*Jane Doe LS 333 v. Uber Technologies, Inc., et  
al*, Case No. 3:23-cv-05930-CRB

*Jane Doe LS 397 v. Uber Technologies, Inc., et  
al*, Case No. 3:24-cv-05864-CRB

1 I, Christopher V. Cotton, state as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber  
3 Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC (collectively, “Uber” or “Defendants”). I offer this  
4 Declaration in the above-captioned matter in support of Defendants’ Opposition to Plaintiffs’ Motion to  
5 Change Time to Comply with Court’s Order Concerning Non-Bona-Fide Receipts.

6 2. On February 15, 2024, the Levin Simes firm served via MDL Centrality an alleged ride receipt for  
7 Plaintiff with MDL ID 1194.

8 3. On September 16, 2024, the Levin Simes firm served via MDL Centrality an alleged ride receipt  
9 for Plaintiff with MDL ID 2350.

10 4. On May 29, 2024, Uber provided a Defendant Fact Sheet indicating that Uber could not locate a  
11 ride receipt that corresponded to the allegations made by Plaintiff with MDL ID 1194.

12 5. On March 17, 2025, Uber provided a Defendant Fact Sheet indicating that Uber could not locate  
13 a ride receipt that corresponded to the allegations made by Plaintiff with MDL ID 2350.

14 6. In light of this Court’s September 9, 2025 Order (ECF 3876), on September 10, I emailed  
15 Plaintiffs’ counsel at the Levin Simes law firm and asked them to provide availability for Plaintiffs with  
16 MDL IDs 1194 and 2350 for depositions between September 26-29 and October 6-9. The Levin Simes  
17 firm did not respond to that request, so I followed up with respect to deposition scheduling on September  
18 12. In response, the Levin Simes firm requested an extension of the deadlines set by the Court. Defendants  
19 did not agree to the requested extension. A true copy of an email chain that reflects these communications  
20 is attached as **Exhibit 1**.

21 I declare under the penalty of perjury under the laws of the United States that the foregoing is true  
22 and correct.

1 Dated: September 15, 2025

Respectfully submitted,

Christopher V. Cotton

By: \_\_\_\_\_

Christopher V. Cotton (admitted *Pro Hac Vice*)

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